

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA) No. 3:18-CR-97
)
)
v.) (JUDGE MARIANI
)
)
ROSS ROGGIO, and)
ROGGIO CONSULTING Co, LLC.)
)
)
Defendants.) (Electronically Filed

BILL OF PARTICULARS

The United States of America, by and through the undersigned Assistant United States Attorney, and pursuant to Federal Rule of Criminal Procedure 32.2(a), particularly alleges that the following property is subject to forfeiture on the basis of the forfeiture allegations set forth in the Superseding Indictment filed in the above-styled criminal case. When the Superseding Indictment (Doc. 122) was filed, it referenced a list of assets to be attached that were not. The Government now submits this Bill of Particulars referencing those specific assets that the Government seeks to forfeit:

1. Long Gun: Armory, Armory-15, 5.56 caliber,
Serial #A0084;
 2. Lyman, Model 1878, 45/70 caliber, serial number

- #18780392;
3. Item 44A - Scope Leopold S/N 325343AA with FDE Springfield Armory Model M1A 30 cal S/N 336481;
 4. Black Silencer Co Supp. Model Specwar 556 S/N SPW-11021;
 5. Item 29A- Scope - From Safe in Basement with Black Rifle w/wooden stock Norinco Rifle Model NDM-86 Cal 7.62X54 S/N 701300 6 Item 26A- Scope Truglo No S/N with Black Ruger with wooden stock Model 10/22 Cal .22 S/N 0005- 51177;
 6. Item 23A Eotech sight with Black CMMG 9mm short barrel rifle Model MK9 S/N SMT03019;
 7. Item 22A Scope Leupold Mark 4scope S/N 161820AB with Black Sig Sauer Model MPX Pistol 9mm S/N 62B02121;
 8. Long Gun: KMP Classic Arms, M1919A4, .30 caliber, Serial #757163 also 1711;

9. Silencer: Salvo 12, 12 gauge, Serial #SAL12-5198
Silencer co.;
10. Pistol: Colt, Commemorative Special Ops, .45
caliber, Serial #2778280;
11. Pistol: Desert Eagle, S0AE, .SO caliber, Serial
#DK-0016164;
12. Item 76A: Scope VISM with Long Gun: Ruger,
10/22, .22 LR caliber, Serial #824-01532;
13. Long Gun: Ruger, 10/22, .22 LR caliber, Serial
#824-01532 with Item 76A: scope VISM;
14. Pistol: Heritage, Rough Rider, .22 caliber, Serial
#C55366;
15. Pistol: Benelli, MP9SE, .22 LR caliber, Serial
#09070B;
16. Long Gun: CAL, M1 Rifle, 30.06 caliber, Serial
#M111778;
17. Item 72A scope with Long Gun: Moisen Magont,
M91/30, 7.62x54 caliber, Serial #M9130S0361
Item 72A scope;

18. Long Gun: Moisen Magont, M91/30T, 7.62x54 caliber, Serial #M9130S03614 with Item 72A scope;
19. Long Gun: Tikka, T-3, .308 Winchester caliber, Serial #0S9939;
20. Item 70A: Scope Nikon P-223 with Long Gun: Marlin Firearms Co, XT-22, .22 Mag caliber, Serial #MM3166SB;
21. Long Gun: Marlin Firearms Co, XT-22, .22 Mag caliber, Serial #MM3166SB with Item 70A: Scope Nikon P-223;
22. Long Gun: Savage Arms, 340D, .222 Rem caliber, Serial #197304;
23. Long Gun: Remington, 870, 12 gauge caliber, Serial #RS77066G;
24. Long Gun: Armory, Armory-15, 5.56 caliber, Serial #A0078;
25. Long Gun: Armory, Armory-15, 5.56 caliber, Serial #A0079;

26. Long Gun: Armory, Armory-15, 5.56 caliber,
Serial #A0090;
27. Long Gun: Armory, Armory-15, 5.56 caliber,
Serial #A0044;
28. Long Gun: Armory, Armory-15, 5.56 caliber,
Serial #A0082;
29. Long Gun: Armory, Armory-15, 5.56 caliber,
Serial #A0086;
30. Long Gun: Armory, Armory-15, 5.56 caliber,
Serial #A0087;
31. Long Gun: Tactical Innovations Inc, TlSBDX,
5.56 caliber, Serial #86700667;
32. Long Gun: Armory, Armory-15, 5.56 caliber,
Serial #A0085;
33. Long Gun: Armory, AR-15, 5.56 caliber, Serial
#A0083;
34. 35 Long Gun: Century Arms, Centurian 93
Sporter US, 5.56 caliber, Serial #C9315088;
35. Item SSA: Sight Mark red dot with Long Gun:

Tactical Innovations, T1SBDX, multi caliber,

Serial #86700666;

36. Long Gun: Tactical Innovations, T1SBDX, multi caliber, Serial #86700666 with Item SSA: Sight Mark red dot;
37. Long Gun: Kris, Vector, .45 ACP caliber, Serial #4SC016113;
38. Long Gun: Century Arms, Centurian 39 Sporter, 7.62X39 caliber, Serial #C39WM-000661;
39. Long Gun: Romarm, WASR, 7.62 caliber, Serial #A132605-1SR0 with Item 52A, Optics, Trijicon RX34;
40. Long Gun: Norinco, model:unknown, S.56X45 caliber, Serial #8451316952;
41. Long Gun: Izhmash, Saiga 410, 7.62X39 caliber, Serial #H04200381;
42. Long Gun: Century Arms, 70ABM, 7.62X39 caliber, Serial #WM02-000907;
43. Long Gun: Century Arms, M70-AB2 Sporter, 7.62

- caliber, Serial #AB2C103045;
44. Long Gun: Fostech, model: unknown, 12 gauge caliber, Serial #0000465;
45. Item 46B: Bipod with Long Gun: Smith & Wesson, M&PlS-22, .22 LR caliber, Serial #HBWSS93;
46. Item 46A: Scope Firefield with Long Gun: Smith & Wesson, M&PlS-22, .22 LR caliber, Serial #HBWSS93;
47. Long Gun: Smith & Wesson, M&PlS-22, .22 LR caliber, Serial #HBWSS93 with Item 46A: Scope Firefield;
48. Item 45A: Optic, Trijicon RX34with Long Gun: Heckler & Koch, SL8-1, .223 caliber, Serial #48007304;
49. Long Gun: Heckler & Koch, SL8-1, .223 caliber, Serial #48007304 with Item 45A: Optic, Trijicon RX34;
50. Long Gun: Kel Tech, RFB, 7.62 caliber, Serial

- #T2555;
51. Item 43A: Aimpoint Micro H-1 with Long Gun:
Sturm Ruger, Ranch Rifle, 5.56 caliber, Serial
#583-11246;
52. Long Gun: Sturm Ruger, Ranch Rifle, 5.56
caliber, Serial #583-11246 with Item 43A:
Aimpoint Micro H-1;
53. Item 42B: Biped, with Long Gun: Heckler &
Koch, SL8-1, .223 caliber, Serial #48009484;
54. Item 42A: Scope, Leupold 1x9 with Long Gun:
Heckler & Koch, SL8-1, .223 caliber, Serial
#48009484;
55. Long Gun: Heckler & Koch, SL8-1, .223 caliber,
Serial #48009484 with Item 42A: Scope, Leupold
1x9;
56. Long Gun: BFI, BACR, Mark 47, multi caliber,
Serial #ACRD00647;
57. Item 40B: Optic, EOTECH Magnifier with Long
Gun: CMMG Inc., Mark 47, 7.62 x 39 caliber,

- Serial #KWT02562;
58. Item 40A: Optic, EOTECH red dot with Long Gun: CMMG Inc., Mark 47, 7.62 x 39 caliber, Serial #KWT02562;
59. Long Gun: CMMG Inc., Mark 47, 7.62 x 39 caliber, Serial #KWT02562 with Item 40A: Optic, EOTECH red dot;
60. Long Gun: PTR Industries, model: unknown, 3.08 caliber, Serial #AW14102;
61. Item 38B: Optic EOTECH Magnifier with Long Gun: Ruger, SR-556, 5.56 caliber, Serial #594-00633;
62. Item 38A: Optic EOTECH Holographic with Long Gun: Ruger, SR-556, 5.56 caliber, Serial #594-00633;
63. Long Gun: Ruger, SR-556, 5.56 caliber, Serial #594-00633 with Item 38A: Optic EOTECH Holographic;
64. Item 37A: Optics Trijicon Reflex RX34 with Long

- Gun: FN Hertsal, SCAR, 5.56 caliber, Serial #LC32494;
65. Long Gun: FN Hertsal, SCAR, 5.56 caliber, Serial #LC32494 with Item 37A: Optics Trijicon Reflex RX34;
66. Item 36A: Optics EOTECH with Long Gun: Armory, Armory-15, 5.56 caliber, Serial #A0033;
67. Long Gun: Armory, Armory-15, 5.56 caliber, Serial #A0033 with Item 36A: Optics EOTECH;
68. Item 35A: Optics Trijicon Reflex RX34 with Long Gun: Tavor, SAR, 5.56 caliber, Serial #T0015911;
69. Long Gun: Tavor, SAR, 5.56 caliber, Serial #T0015911 with Item 35A: Optics Trijicon Reflex RX34;
70. Item 34B: Bipod with Long Gun: Remington, Model 700MC-SD, .300 MC Blackout caliber, Serial #RR76324C;
71. Item 34A: Scope Zeiss Terra 3X with Long Gun: Remington, Model 700MC-SD, .300 MC Blackout

- caliber, Serial #RR76324C;
72. Long Gun: Remington, Model 700MC-SD, .300 MC Blackout caliber, Serial #RR76324C with Item 34A: Scope Zeiss Terra 3X;
73. Long Gun: Tavor, X95, 5.56 caliber, Serial #T00SS070;
74. Item 32A: Scope MSAR PN219 with Long Gun: MSAR, STG556, .223 caliber, Serial #600-P002734;
75. Item 31A: Optics, EOTECH with long Gun: MSAR, XM17E4, .223 caliber, Serial #600-P012022;
76. Long Gun: MSAR, STG556, .223 caliber, Serial #600-P002734 with Item 32A: Scope MSAR PN219;
77. Long Gun: MSAR, XM17E4, .223 caliber, Serial #600-P012022 with Item 31A: Optics, EOTECH;
78. Item 30B: Optics - aimpoint with Pistol: Glock, 17, 9mm caliber, Serial #YBV536;

79. Item 30A: RONI Pistol carbine conversion with
Pistol: Glock, 17, 9mm caliber, Serial #YBV536;
80. Pistol: Glock, 17, 9mm caliber, Serial #YBV536,
Inside Item 30A: RONI Pistol carbine conversion;
81. Item 29B: Bipod with Long Gun: Sig Sauer,
7.62mm NATO caliber, Serial #22C013386;
82. Item 29A: Apex Scope with Long Gun: Sig Sauer,
7.62mm NATO caliber, Serial #22C013386;
83. Long Gun: Sig Sauer, model: MR556, 7.62mm
NATO caliber, Serial #22C013386 with Item 29A:
Apex Scope;
84. Item 28A: Scope ACOG attached to Long Gun:
Heckler & Koch, MR556, 5.56mm caliber, Serial
#241202064;
85. Long Gun: Heckler & Koch, MR556, 5.56mm
caliber, Serial #241202064 with Item 28A: Scope
ACOG;
86. Pistol: Ruger, New Vaquero, 45 Colt caliber,
Serial #SASS54920;

87. Item 26A Scope Leupold VX-R, Serial #
186502AB with Long Gun: Springfield Armory,
M1A, 7.62 Caliber, Serial #347037;
88. Long Gun: Springfield Armory, M1A, 7.62 Caliber,
Serial #347037 with Item 26A Scope Leupold VX-R,
Serial #186502AB;
89. Item 25B Bipod with Long Gun: Barrett, 82Al,
.50 Caliber, Serial #AA003811;
90. Item 25A Scope Leupold Mark 4 with Long Gun:
Barrett, 82Al, .50 Caliber, Serial #AA003811;
91. Long Gun: Barrett, 82Al, .50 Caliber, Serial
#AA003811 with Item 25A Scope Leupold Mark
4;
92. Item 24B -Bipod - with Long Gun: Weatherby,
Mark 4, Caliber unknown, Serial #BW006739;
93. Item 24A Swarovski Z34-12x50 with Long Gun:
Weatherby, Mark 4, Caliber unknown, Serial
#BW006739;
94. Long Gun: Weatherby, Mark 4, Caliber unknown,

Serial #BW006739 with Item 24A Scope

Swarovski Z34-12x50;

95. Item 23A SScope Leupold VX-1 Serial #161831AC with Long Gun: RND, Edge .223 Caliber Serial #2931124;
96. Bipod - Item 23B with Long Gun: RND, Edge .223 Caliber Serial #2931124;
97. Long Gun: RND, Edge .223 Caliber Serial #2931124 with Scope Leupold VX-1 Serial #161831AC Item 23B;
98. Bipod - Item 21B with Long Gun: Armory, TAC 338, .338 Lapua Mag Caliber Serial #TB30928;
99. Bipod - Item 20B with Long Gun: Armory, TAC 338, .338 Lapua Mag Caliber Serial #TB30729 Bipod - Item 20B;
100. Pistol: Heckler & Koch, SP5K, 9mm caliber, Serial #215002826;
101. Pistol/Revolver: Ruger, New Vaquero .45 Colt caliber, Serial #SASS54919;

102. Pistol/Revolver: Pietta, Cimmaron .45 Caliber, Serial #E38704;
103. Leupold Mark 4Scope Item 21A attached to Long Gun: Armory, TAC 338, .338 Lapua Mag Caliber Serial #TB30928;
104. Long Gun: Armory, TAC 338, .338 Lapua Mag Caliber Serial #TB30928 with Leupold Mark 4Scope Item 21A;
105. Leupold Mark 4 Scope Item 20A attached to Long Gun: Armory, TAC 338, .338 Lapua Mag Caliber Serial #TB30729;
106. Long Gun: Armory, TAC 338, .338 Lapua Mag Caliber Serial #TB30729 with Leupold Mark 4Scope Item 20A;
107. Pistol/Revolver: A. Uberti, 1873, model unknown, .45 Caliber, Serial #P37550;
108. Pistol/Revolver: Old Saybrook, Traditions 45 Colt caliber, Serial #E58949;
109. Pistol/Revolver: Filippetta, model unknown, .44

- Caliber, Serial #653026;
110. Pistol/Revolver: Ruger, New Vaquero .45 colt caliber, Serial #512-64623;
111. Pistol/Revolver: A. Uberti, 1873 .45 colt caliber, Serial #TC6294;
112. Pistol/Revolver: A. Uberti, Cimarron .45 colt caliber, Serial #P37551;
113. 6A Scope Hi-Lux Optics Serial #003175 attached to Long Gun: RRMW, Replica 1903, 30.06 Serial #3998129, 6A Scope Hi-Lux Optics Serial #003175;
114. Item 3A Sight Mark Optics attached to Long Gun; Masterpiece Arms, Defender, 9mm caliber, Serial #B985076;
115. Pistol/Revolver: Old Saybrook CZ, Traditions 45Colt caliber, Serial #ES7108;
116. Long Gun: Taurus, R92 .45 Colt caliber Serial #AM217918;
117. Long Gun: CZ-USA, Huglu Hammer Classic

Shotgun, 12Gauge Serial #15O3244. Per telephone call with ATF, National Tracing Center, trace request was modified to reflect an

"O" 118 instead of a zero in the serial number;

118. Long Gun: Taurus, R92 .45 Colt caliber Serial #S1T20531;

119. Long Gun: RRMW, Replica 1903, 30.06 Serial #3998129, 6A Scope Hi-Lux Optics Serial #003175;

120. Long Gun; DSA SASS .308 Caliber Serial #DS41249;

121. Long Gun; FNH Scar 175, 7.62X51mm Serial #HC43137;

122. Long Gun; Masterpiece Arms, Defender, 9mm caliber, Serial #FJ00408 with Item 3A Optics;

123. Long Gun; CZ-USA Scorpion EV0351 9X19mm Serial #EV0351;

124. Long gun: Sig Sauer, MPX 9mm Serial #62B023427;

125. FDE Springfield Armory Model M1A 30 cal S/N 336481 with Item 44A - Scope Leopold S/N 325343AA. ATF Trace Request for the weapon was corrected with the serial number 126 336481 during tel cal with Alex from the National Tracing Center;
126. Black Advanced Armorment Corp Suppressor Model Cyclops SO S/N 500330 in case;
127. FDE Surefire Suppressor SOCOMSS6 S/N AS1N01332;
128. 129 FDE Surefire Suppressor SOCOMSS6 S/N AS1N01331;
129. Black SWR Suppressor Mod Specwar S/N SW762-2289;
130. Black Silencer Co Supp. Model Specwar 556 S/N SPW-11020;
131. Black Griffin Armament Suppressor Model RECCES S/N RECS-0027;
132. 133 Black Silencerco Suppressor Specwar S/N

SW-762-4578;

133. Black Griffin Armament Suppressor Model

Recces S/N RECS-0026;

134. Black Griffin Armament Suppressor Model

Sparatn3 S/N SP3-0080;

135. Black YHM Suppressor Mod. Phantom M2 S/N

Y19391;

136. 137 Black YHM Suppressor Mod. Phantom M2

S/N Y17980;

137. Black TBAC Suppressor Model 3388A S/N 51491;

138. Black TBAC Suppressor Model 3388A S/N 51490;

139. Black Rifle w/wooden stock Norinco Rifle Model

NDM-86 Cal 7.62XS4 S/N 701300 with Item 29A-

Scope - From Safe in Basement;

140. Black Armory AR-15 rifle Model Armory-15 .223

cal S/N A0091 From Safe in Basement;

141. OD green Pof USA AR-10 Rifle Model P-308 S/N

12BA-13062 .38cal;

142. Black Ruger with wooden stock Model 10/22 Cal

.22 S/N 0005-51177 with Item 26A- Scope Truglo

No S/N;

143. Black Armory AR15 Rifle Model Armory-15 cal

.223 S/N A0092;

144. Black Zenith firearms short barrel rifle Model

MKEZSRS 9mm S/N T0624-1SBH01066 9mm;

145. Black CMMG 9mm short barrel rifle Model MK9

S/N SMT03019 with Item 23A Eotech sight

attached;

146. Item 22B - Black Suppressor attached to item

#22, S/N REV9-0232. Griffin Armament

Suppressor Revolution 9mm {Silencer could not

be removed);

147. Black Sig Sauer Model MPX Pistol 9mm S/N

62B02121 with Item 22A Scope Leupold Mark

4scope S/N 161820AB and Item 22B Black

suppressor attached to item #22, S/N REV9- 148

0232;

148. Black Zenith Firearms short barrel rifle Model

MKE25P 9mm S/N T0624-15BK00800;

149. Attached to Item#19 Black Advanced Armament Corp. Suppressor Model element# 2 S/N E106548;
150. Black Walther Model P22 22cal S/N WA094850 with attached Item 20 Black Advanced Armament Corp. Suppressor Model element# 2 S/N E106548;
151. Item 17A- Black Griffin Armament Suppressor Revolution 9 S/N REV9-0294 with Black/Tan Springfield Armory Model XD9 pistol S/N MG436167 9mm;
152. Black/Tan Springfield Armory Model XD9 pistol, caliber 9mm, S/N MG436167 9mm with Item 17A Black Griffin Armament Suppressor Revolution 9 S/N REV9-0294;
153. Black Springfield Armory Operator 45cal. pistol S/N LW132150;
154. Black Glock Model 19 9mm pistol S/N ZFW272;
155. Black Colt Cobra 38 Spec. revolver S/N A73054;

156. Black Colt Python 357mag. revolver S/N 82749E;
157. Black Colt Python 357mag. revolver S/N K39803;
158. Black Colt Python 357mag. revolver S/N 42376E;
159. Black Springfield Armory Champion Operator
45cal pistol S/N LW134249;
160. Black Berretta 92FS 9mm S/N BER678157;
161. Silver Colt Anaconda 44mag revolver S/N
MM48433;
162. Black Glock Model 17 9mm S/N Y1A710;
163. Springfield Armory NRA 125th Anniversary #295
of 525, model 1076, 45 cal. S/N N342895;
164. Silver Smith & Wesson pistol Model 1076, caliber
unknown, serial: THB9323;
165. Black Silnecerco Suppressor Model Octane 45 HD
S/N OCT45-5275;
166. Black Remington Model 1911 R1 Pistol 45cal.
Serial: RHN39374A;
167. Black Glock Pistol Model 26 9mm S/N ZAN199;
and

168. Black Smith & Wesson Pro Series 45 cal. S/N
UCW6022.

Respectfully submitted,

JOHN C. GURGANUS
UNITED STATES ATTORNEY

By: /s/ Sean A. Camoni
SEAN A. CAMONI
Assistant U.S. Attorney
235 N. Washington Avenue, Ste. 311
Scranton, PA 18503
Phone: 570-348-2800
Fax: 570-348-2037
sean.a.camoni@usdoj.gov

CERTIFICATE OF SERVICE

Pursuant to Standing Order 03-1 and Local Rules 4.2 and 5.7, I hereby certify that the foregoing document was served through electronic case filing on March 25, 2022.

Respectfully submitted,

JOHN C. GURGANUS
UNITED STATES ATTORNEY

By: /s/ Sean A. Camoni
SEAN A. CAMONI
Assistant U.S. Attorney
235 N. Washington Avenue, Ste. 311
Scranton, PA 18503
Phone: 570-348-2800
Fax: 570-348-2037
sean.a.camoni@usdoj.gov